

SULLIVAN & WORCESTER LLP

Pamela Smith Holleman (PH 4465)
Jeanne P. Darcey (*admitted pro hac vice*)
One Post Office Square
Boston, MA 02109
Telephone: (617) 338-2800
Facsimile: (617) 338-2880

and

Timothy J. Pfister
1290 Avenue of the Americas
New York, NY 10104
Telephone (212) 660-3000
Facsimile (212) 660-3001

*Counsel to the Finnish Program Securities
Holders (as identified herein), U.S. Bank National Association,
as Trustee and Acta Asset Management ASA of Sweden*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re)	Chapter 11
)	
LEHMAN BROTHERS HOLDINGS, INC.,)	Case No. 08-13555 (JMP)
<i>et al.</i> ,)	
)	
Debtors.)	
)	

**AMENDED VERIFIED STATEMENT OF SULLIVAN & WORCESTER LLP
PURSUANT TO BANKRUPTCY RULE 2019(a)**

Sullivan & Worcester LLP, a law firm with offices at One Post Office Square, Boston, Massachusetts 02109 and 1290 Avenue of the Americas, New York, New York 10104 (“S&W”), pursuant to Rule 2019(a) of the Federal Rules of Bankruptcy Procedure, makes this amended verified statement in connection with S&W’s representation of more than one creditor in the above-captioned bankruptcy proceedings, stating as follows:

1. S&W has been retained to represent various creditors (collectively, the “Finnish Program Securities Holders”) in connection with certain transactions as set forth herein, and duly filed with this Court its Verified Statement of Sullivan & Worcester LLP Pursuant to Bankruptcy

Rule 2019(a) on December 4, 2009 [Docket No. 6044].¹ In particular, each of the Finnish Program Securities Holders is the holder² of one or more senior notes issued by Lehman Brothers Treasury Co. B.V. and backed by one or more senior guarantees issued by Lehman Brothers Holdings, Inc. pursuant to that certain U.S. \$100,000,000,000 Euro Medium Term-Note Program as described in (i) that certain Base Prospectus dated 24 July 2007, and (ii) Final Terms dated 18 December 2007 for the Issue of EUR 9,140,000 Index-Linked Redemption Notes due January 2013 relating to a Basket of Indices and/or Final Terms dated 26 February 2008 for the Issue of EUR 6,597,000 Multi-Asset-Linked Redemption Notes due March 2013 relating to a Basket of Assets. The names, addresses, and amounts claimed by each of the Finnish Program Securities Holders as of the commencement of these bankruptcy cases are listed in **Exhibit A** attached hereto and made a part hereof.

2. S&W was retained by U.S. Bank National Association (“U.S. Bank”) in March 2010, shortly after U.S. Bank’s appointment to the Official Unsecured Creditors Committee (the “Committee”) on February 9, 2010.³ U.S. Bank serves as indenture trustee, owner trustee, collateral or administrative agent and/or swap counterparty for more than 800 transactions involving one or more of the debtors in the above-captioned cases (the “Debtors”). S&W

¹ Upon information and belief, Finlandia Group Plc has acted as agent/broker for each of the Finnish Program Securities Holders in connection with the transactions that gave rise to each of the claims by the Finnish Program Securities Holders in these cases, and holds a power of attorney signed by each of the Finnish Program Securities Holders authorizing it to act in their name(s) and/or on their behalf in insolvency proceedings including, among other things, signing and filing proofs of claim in such proceedings. Finlandia Group Plc, in turn, has caused S&W to be retained to represent the interests of each of the Finnish Program Securities Holders in the above-captioned cases. See Verified Statement of Finlandia Group Plc Pursuant to Bankruptcy Rule 2019(a), filed with the Court on December 4, 2009 [Docket No. 6046].

² The notes were issued in registered, uncertificated and dematerialized book-entry form pursuant to the Base Prospectus and related securities documents.

³ Immediately upon its appointment to the Committee, U.S. Bank retained Richard Hiersteiner and Jeanne Darcey, of the law firm of Edwards Angell Palmer & Dodge LLP to represent it as a member of the committee. Mr. Hiersteiner and Ms. Darcey joined S&W in March, 2010, at which time U.S. Bank retained S&W.

represents U.S. Bank solely with respect to its role as a member of the Committee and not with respect to any individual transaction. The name and business address of the account officer at U.S. Bank who serves as the U.S. Bank's representative to the Committee is as follows:

Laura L. Moran
Vice President
U.S. Bank National Association
Corporate Trust Services Division
One Federal Street, 3rd Floor
Boston, MA 02110

3. S&W was retained by Acta Asset Management ASA of Sweden ("Acta") in connection with the purchase, sale, transfer and assignment by, or through, Acta of rights, interests in and claims against the Debtors as set forth in various Proofs of Claims filed by creditors against one or more of the Debtors, including, without limitation, in connection with one or more senior notes issued by Lehman Brothers Treasury Co. B.V. and backed by one or more senior guarantees issued by Lehman Brothers Holdings, Inc. pursuant to that certain US \$100,000,000,000 Euro Medium Term Note program described in paragraph 1 above.

4. The undersigned hereby declares that the foregoing information is true and accurate, to the best of the undersigned's knowledge, information and belief.

Dated: April 5, 2011

/s/ Pamela Smith Holleman
SULLIVAN & WORCESTER LLP
Pamela Smith Holleman (PH 4465)
Jeanne P. Darcey
One Post Office Square
Boston, MA 02109
Telephone (617) 338-2800
Facsimile (617) 338-2880
pholleman@sandw.com
jdarcey@sandw.com

and

Timothy J. Pfister
1290 Avenue of the Americas
New York, NY 10104
Telephone (212) 660-3000
Facsimile (212) 660-3001
tpfister@sandw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date she caused a true and correct copy of the foregoing to be served by first class mail, postage prepaid, upon counsel to the debtors, the Official Committee of Unsecured Creditors, and the Office of the United States Trustee, as set forth below, and to all other parties-in-interest via the Court's ECF notification system.

Shai Waisman
Weil Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
shai.waisman@weil.com

Dennis F. Dunne
Milbank, Tweed, Hadley & McCloy LLP
1 Chase Manhattan Plaza
New York, NY 10005
ddunne@milbank.com

Andrew D. Velez-Rivera
Office of the United States Trustee
33 Whitehall Street, Suite 2100
New York, NY 10004

Dated: April 5, 2011

/s/ Pamela Smith Holleman
Pamela Smith Holleman